

**AFFIDAVIT**

I, William P. Akins, a Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, depose and state:

**INTRODUCTION:**

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since February of 2019. Since February of 2019, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the fourteen-week training course at the United States Postal Inspection Service Academy in Potomac, Maryland. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 13 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances. During my almost 16 year career as a Federal Law Enforcement Officer, I have been involved in numerous criminal investigations which have resulted in arrests, recovery of evidence and seizure of property. I have also written and executed numerous search warrants resulting in the seizure of thousands of dollars and controlled substances.

**DESCRIPTION OF SUBJECT PARCEL:**

2. This affidavit is made in support of an Application and Affidavit for Search Warrant for a United States Postal Service (USPS) Priority Mail (PM) parcel.

The parcel has Tracking Number 9505 5128 5587 1305 5961 77, bearing \$34.50 in postage, postmarked from Tucson, Arizona on November 1, 2021. It bears a return address of “Andres Gomez, 2121 N. Camino Pio Decimo, Tucson, Arizona 85715” and is addressed to “Letticia Jackson, PO Box 47705, 60647, Chicago, IL”. The article consists of a Magnavox portable speaker cardboard box measuring approximately 16” x 10” x 9” and weighing approximately 7 pounds and 13 ounces. It is hereafter referred to as “SUBJECT PARCEL 1”.

**BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA AND THE USPS DRUG MAIL PROFILING PROGRAM:**

3. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and the proceeds from the sale of controlled substances, I am aware that the southern Arizona international border is a leading area for the entry of controlled substances from Mexico into the U.S. Based on the large quantities of controlled substances entering southern Arizona, controlled substances are frequently transported from southern Arizona via the United States Mail to areas across the United States, primarily to the large metropolitan areas in the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to southern Arizona via the United States Mail. By using the U.S. Mail to ship controlled substances, these drug

traffickers put unknowing postal employees who handle and deliver those mailings at risk.

4. Based on the frequent use of the United States Mail for the shipment of controlled substances from southern Arizona and California, Postal Inspectors in Tucson and other locations near the southwest border routinely observe inbound and outbound mail articles for suspicious characteristics common to mailings of drugs and drug proceeds. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:
  - a. Suspected parcels are mailed to or from known drug destination areas, primarily the large metropolitan areas in United States and Puerto Rico.
  - b. The sender names and addresses on drug or drug proceeds parcels routinely contain misspellings, incomplete, inaccurate, unauthorized and/or fictitious information.
  - c. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.
  - d. The postage was paid with cash which leaves no trail identifying the mailer.
5. Parcels found to meet some or all of the suspicious characteristics described in subsections "a" through "d" of this paragraph are further investigated by Postal Inspectors.

**INVESTIGATIVE DETAILS:**

6. On November 1, 2021, at approximately 4:27 p.m., I was notified by law enforcement officers with the Drug Enforcement Administration that a suspect they are investigating for distributing narcotics through the USPS, mailed SUBJECT PARCEL 1 at the Mission Station Post Office located at 315 W. Valencia Road, Tucson, AZ 85706. Those law enforcement officers believed SUBJECT PARCEL 1 contained narcotics.
7. I contacted the Mission Station Post Office and requested SUBJECT PARCEL 1 be sent to me in Tucson, Arizona.
8. On November 3, 2021, I obtained SUBJECT PARCEL 1 and found it had the following characteristics common to drug parcels, namely:
  - a. It was mailed from Tucson, AZ which is an area I know to be a source area for drugs.
  - b. It has a tracking number. From my experience, I know that nearly all drug and drug proceeds parcels bear tracking numbers allowing the sender and receiver to track the progress of the shipment from origination to destination.
  - c. There are no telephone numbers on the mailing labels. In my experience, legitimate mailers who use the USPS Priority Mail expedited service regularly include telephone numbers in the spaces provided on the label because they paid a premium price for the service and want to be contacted to help facilitate a timely delivery should a problem arise.

d. The subject parcel was paid for in cash to keep the anonymity of the sender from being identified by law enforcement.

9. I accessed “Thomson Reuters CLEAR” to check for records of the names and addresses listed on SUBJECT PARCEL 1. Thomson Reuters CLEAR is an online service that provides an extensive collection of public records used primarily by corporate security departments and law enforcement agencies nationwide for investigative purposes. Both addresses were verified for mail delivery however, there were no current records associating the sender’s name with the corresponding address listed on SUBJECT PARCEL 1.

10. Canine Examination:

a. On November 3, 2021, at approximately 9:22 a.m., I met with Supervisory Border Patrol Agent Canine Handler Paul Du Bois and his canine partner Dell. Agent Du Bois’ canine is trained and certified to detect the odors of marijuana, heroin, cocaine, methamphetamine and their derivatives. I placed SUBJECT PARCEL 1 in a cleared area for examination by Agent Du Bois and Dell. Agent Du Bois informed me at approximately 9:30 a.m. that Dell alerted to SUBJECT PARCEL 1, indicating the presence of narcotics or a controlled substance, or other evidence with an odor of narcotics or a controlled substance within the parcel.

11. Based on the facts set forth in this affidavit, I believe there is probable cause to show that SUBJECT PARCEL 1 contain controlled substances and/or proceeds from the sale of controlled substances, constituting evidence of

violations of Title 21, United States Code, Sections 841 (a) (1), Possession with Intent to Distribute a Controlled Substance, and 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.

12. This affidavit is submitted for the limited purpose of seeking authorization to search SUBJECT PARCEL 1. Your Affiant has not set forth each and every fact known to him regarding the investigation.

*William P. Akins*

---

William P. Akins  
United States Postal Inspector

Subscribed and sworn to me telephonically on  
This 3<sup>rd</sup> day of November, 2021

  
Eric J. Markevich  
UNITED STATES MAGISTRATE JUDGE